

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
AUSTIN DIVISION**

LEILA GREEN LITTLE, JEANNE  
PURYEAR, KATHY KENNEDY,  
REBECCA JONES, RICHARD DAY,  
CYNTHIA WARING, AND DIANE  
MOSTER, §  
Plaintiffs, §  
v. §  
LLANO COUNTY, RON CUNNINGHAM, §  
in his official capacity as Llano County §  
Judge, JERRY DON MOSS, in his official §  
capacity as Llano County Commissioner, §  
PETER JONES, in his official capacity as §  
Llano County Commissioner, MIKE §  
SANDOVAL, in his official capacity as §  
Llano County Commissioner, LINDA §  
RASCHKE, in her official capacity as Llano §  
County Commissioner, AMBER MILUM, §  
in her official capacity as Llano County §  
Library System Director, BONNIE §  
WALLACE, in her official capacity as §  
Llano County Library Board Member, §  
ROCHELLE WELLS, in her official §  
capacity as Llano County Library Board §  
Member, RHONDA SCHNEIDER, in her §  
official capacity as Llano County Library §  
Board Member, and GAY BASKIN, in her §  
official capacity as Llano County Library §  
Board Member, §  
Defendants. §

**DECLARATION OF CYNTHIA WARING IN SUPPORT OF PLAINTIFFS' MOTION FOR PRELIMINARY INJUNCTION**

I, Cynthia Waring, declare:

1. I make this declaration based on personal knowledge. If called upon to testify, I could and would testify competently to the following facts.
2. I am a resident of Llano County. I have a library card that gives me access to books available in the Llano County public libraries. I have used my Llano County library card to check out books from the public libraries for several years. I check out many different types of library books from Llano County public libraries on a variety of topics, including fiction and nonfiction books, and books written for young adults and adults.
3. I know that several books were removed from Llano County's physical library collection, including the following: (1) *Caste: The Origins of Our Discontent* by Isabel Wilkerson; (2) *They Called Themselves the K.K.K: The Birth of an American Terrorist Group* by Susan Campbell Bartoletti; (3) *Spinning* by Tillie Walden; (4) *In the Night Kitchen* by Maurice Sendak; (5) *It's Perfectly Normal: Changing Bodies, Growing Up, Sex and Sexual Health* by Robie Harris; (6) a read-aloud picture book series including *My Butt is So Noisy!, I Broke My Butt!*, and *I Need a New Butt!* by Dawn McMillan; (7) a read-aloud picture book series including *Larry the Farting Leprechaun*, *Gary the Goose and His Gas on the Loose*, *Freddie the Farting Snowman*, and *Harvey the Heart Has Too Many Farts* by Jane Bexley; (8) *Being Jazz: My Life as a (Transgender) Teen* by Jazz Jennings; (9) *Shine* by Lauren Myracle; (10) *Gabi, a Girl in Pieces* by Isabel Quintero; and (11) *Freakboy* by Kristin Elizabeth Clark. I cannot check out these books because they are no longer on library shelves or in the Llano County library catalog. I would check out these books in the future if they were returned to library shelves.
4. I would also use my library card to access ebooks and audiobooks on OverDrive in the future if access to OverDrive were reinstated.

5. Before its termination, OverDrive was of particular importance to me because I suffer from visual impairments that make reading regular-sized print books very difficult. The viewing features that ebooks offer me, for example, adjusting font size and lighting background, are extremely helpful for reading.

6. OverDrive was also a vital resource for me because my husband and I frequently travel to Austin to visit my daughter, in part because our granddaughter has special needs and requires adult supervision at all times and the circle of adults who can and do provide this care is very limited. With all the travelling we have to do, OverDrive was life changing for me because it offered me access to library books while away from home. Since the pandemic started, I became even more dependent on OverDrive. I was unable to go into a library in person because I could not risk infecting my granddaughter or my 85-year-old husband. E-reading was all I could do during the pandemic. And thank the stars I had it!

1. When Llano County took away access to Overdrive I was absolutely devastated. I could not believe that the County my home is in, and the County I pay taxes to, took away more than 17,000 books from me and others in one fell swoop. And to this day, they are still gone. I have attempted to access OverDrive with my Llano County library card without success. I was also angered, dismayed, and outraged with the removal of OverDrive because of my concerns for my husband, who suffers from wet macular degeneration (gradual blindness). As a family, we have had a long road with this disease. He gets shots in his eye about every month or two to address the progression of vision loss. OverDrive was truly a game changer for him and our family. For years I have witnessed that OverDrive enables him to continue to thrive and be connected to the world because he can still read books because of it. This connection that

OverDrive offers is very dear to me and I feel fiercely about protecting it, not only because of my own vision impairments but also for him and others like him.

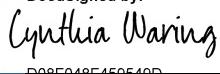
2. I absolutely revere libraries. I have since I was a child, when I used to ride my bicycle to my local library. A kind librarian recognized how much I needed that sanctuary, and encouraged me to read all kinds of books, including books I never would have picked for myself: fiction, non-fiction, autobiographies of people I could not even have imagined. Those books inspired me. I became a prolific reader.

3. The censorship of library books is so troubling to me not just because I cannot access books that I want to read, but because all of Llano County is being deprived of access to books and to the sanctuary they can provide.

I swear under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge.

Dated: May 8, 2022

By:

DocuSigned by:  
  
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Cynthia Waring